

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, NV Bar No. 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN LLP
14 16501 Ventura Blvd, Suite 400
15 Encino, California 91436
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

18 Attorneys for Defendant
19 FIDELITY NATIONAL TITLE INSURANCE COMPANY
20
21 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

23 Gary L. Compton, State Bar No. 1652
24 2950 E. Flamingo Road, Suite L
25 Las Vegas, Nevada 89121

26
27 **UNITED STATES DISTRICT COURT**
28 **DISTRICT OF NEVADA**

29 WELLS FARGO BANK, N.A.,
30
31 Plaintiff,

32 vs.

33 FIDELITY NATIONAL TITLE GROUP,
34 INC. et al.,
35
36 Defendants.

Case No.: 2:21-CV-00996-APG-DJA

**STIPULATION AND ORDER TO TO
EXTEND TIME TO REPLY IN
SUPPORT OF MOTION TO DISMISS
(ECF NO. 44)**

FIRST REQUEST

37 COMES NOW defendant Fidelity National Title Insurance Company (“Fidelity”) and
38 plaintiff Wells Fargo Bank, N.A. (“Wells Fargo”), by and through their respective attorneys of
record, which hereby agree and stipulate as follows:

1. On May 24, 2021, Wells Fargo filed its complaint in the Eighth Judicial District

1 Court for the State of Nevada (ECF No. 1-1);

2 2. On May 24, 2021, Fidelity removed the instant case to the United States District
3 Court for the State of Nevada (ECF No. 1);

4 3. On October 20, 2021, Fidelity moved to dismiss Wells Fargo's complaint (ECF
5 No. 27);

6 4. On December 3, 2021, Wells Fargo opposed Fidelity's motion to dismiss (ECF No.
7 44);

8 5. Counsel for Fidelity requests a 31-day extension to reply in support of its motion to
9 dismiss, such that Fidelity's reply shall be due on January 10, 2022, to afford Fidelity's counsel
10 additional time to review and respond to Wells Fargo's opposition.

11 6. Counsel for Wells Fargo does not oppose the requested extension;

12 7. This is the first request for an extension made by counsel for Fidelity, which is
13 made in good faith and not for the purposes of delay.

14 **IT IS SO STIPULATED** that Fidelity's reply in support of its motion to dismiss is hereby
15 extended through and including Monday, January 10, 2022.

16 Dated: December 6, 2021

SINCLAIR BRAUN LLP

17 By: /s/-Kevin S. Sinclair

18 KEVIN S. SINCLAIR
19 Attorneys for Defendant
FIDELITY NATIONAL TITLE INSURANCE
COMPANY

20 Dated: December 6, 2021

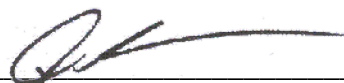
WRIGHT FINLAY & ZAK, LLP

21 By: /s/-Lindsay D. Dragon

22 LINDSAY D. DRAGON
23 Attorneys for Plaintiff
WELLS FARGO BANK, N.A.

24 **IT IS SO ORDERED.**

25 Dated this 7th day of December, 2021.

26 

27 ANDREW P. GORDON
28 UNITED STATES DISTRICT COURT JUDGE